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Public Comments on Aviation Communications:=====

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Submitter Info:

First Name: David H

Last Name: Schultz

Mailing Address: 6545 Tracyton Blvd NW

City: Bremerton

Country: United States

State or Province: WA

Postal Code: 98311-8986

Organization Name: US Citizen

Comment: As an aircraft owner and pilot, I strongly oppose implementation of the proposed rule-making to ban 121.5 MHz emergency locator transmitters (ELTs) for several reasons:

- 1) the rule-making does not fulfill the goals of your charter to facilitate efficient and effective use of the aeronautical spectrum, avoid unnecessary regulation, nor enhance safety of flight.
- 2) the FCC should defer to the FAA for determination of policy related to the safety of flight.
- 3) the financial burden of the mandated shift (FAA estimate of \$500 M) far exceeds the improvement in safety of flight.
- 4) the 121.5 MHz frequency is monitored by several facilities.

5) alternative technologies such as personal locator beacons provide emergency tracking that rivals or exceeds that of 406 MHz ELTs.

6) any benefits from a mandatory shift to 406 MHz ELTs are minimal, short lived, and mooted because of the shift to Automatic Dependent Surveillance-Broadcast (ADSB) transmitters required in most airspace in 2020 that provides accurate tracking.

7) required annual inspections of currently installed ELTs ensure adequate fulfillment of their purpose until the implementation of an already-required upgrade (ADSB) that does facilitate the efficient and effective use of the aeronautical spectrum.

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